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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, *et al.*, individually and  
on behalf of all similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER GRANTING  
JOINT SUBMISSION RE: SEALING  
PORTIONS OF AUGUST 5, 2022 ORDER  
ON (1) GOOGLE'S ADMINISTRATIVE  
MOTIONS FOR EXTENSION/  
CLARIFICATION OF PRESERVATION  
PLAN ORDERS AND (2) CALHOUN  
PLAINTIFFS' MOTION FOR  
CLARIFICATION OF PRESERVATION  
PLAN ORDER (DKT. 657)**

Referral: Hon. Susan van Keulen, USMJ

**[PROPOSED] ORDER**

Before the Court is the Parties' Joint Submission Re: Sealing Portions of the August 5, 2022 Order on (1) Google's Administrative Motions for Extension/Clarification of Preservation Plan Order; and (2) *Calhoun* Plaintiffs' Administrative Motion for Clarification of the Preservation Plan Order (Dkt. 657) ("Joint Submission"). Having considered the Joint Submission, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

Document Sought to Be Sealed	Court's Ruling on Motions to Seal	Basis for Sealing Portion of Document
August 5, 2022 Order on (1) Google's Administrative Motions for Extension/Clarification of the Preservation Plan Orders and (2) <i>Calhoun</i> Plaintiffs' Motion for Clarification of Preservation Plan Order	GRANTED as to redacted portions at:  Pages 4:5, 4:8-9, 5:3, 5:15, 6:3-5, 6:11, 6:13, 6:17, 7:3, 7:5-6, 7:11, 8:5, 8:7, 9:2, 9:14, 10:1-4, 10:12-14, 11:1-3, 11:16-17, 12:1-2, 12:6-7, 12:20, 12:23-24, 13:8, 13:11-12, 13:14-15	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 61 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.

**SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
HON. SUSAN VAN KEULEN  
United States Magistrate Judge